

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID ELLIOTT GAINES, JR.,

Defendant.

INDICTMENT

The Grand Jury charges:

(False Statement in Purchase of a Firearm)

On or about October 7, 2022, in Eaton County, in the Southern Division of the Western District of Michigan,

DAVID ELLIOTT GAINES, JR.,

in connection with the acquisition of a firearm, specifically a Smith & Wesson, Model “M&P Shield,” .40 S&W caliber semiautomatic pistol, from a licensed dealer of firearms, knowingly made a false or fictitious written statement, intended and likely to deceive the firearms dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Chapter 44 of Title 18 of the United States Code.

Specifically, the defendant falsely represented on a Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 (Firearms Transaction Record) that he was the actual buyer of the firearm and that he was not acquiring the firearm on behalf of another person.

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(a)(2)

A TRUE BILL

[/s/ Redacted]

GRAND JURY FOREPERSON

MARK A. TOTTEN

United States Attorney



NILS R. KESSLER

Assistant United States Attorney